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April 12, 2025

Honorable Evelyn Padin, U.S.D.J.
Martin Luther King, Jr. U.S. Office & Courthouse
50 Walnut Street
Newark, NJ 07102

RE: United States v. Walter Hass
Criminal No. 24-728

Dear Judge Padin:

We write to request, respectfully and with the government's consent, that the Court adjust the schedule for submission of sentencing memoranda.

The sentencing hearing is presently scheduled for April 30, 2025. Neither the government nor the defense seeks to adjourn that hearing.

By email dated April 4, 2025, the Court informed counsel that each party should submit their respective sentencing memoranda by April 16, 2025. However, on April 11, 2025, Probation filed a revised presentence report which advocates a 5-level increase in the total offense level recommended by the original presentence report. We understand that the government intends to support that increase in its sentencing memorandum.

Accordingly, we respectfully request that the Court defer the deadline for our sentencing memorandum until April 23, 2025, to enable us to respond to the government's anticipated arguments in support of that proposed increase. The government consents to this request. Should the Court agree, please conform this letter into an order by executing the space below and entering this letter order on the docket. We thank the Court for considering this submission.

Respectfully,

/s/ Guillermo Arango

cc: Katherine Calle

SO ORDERED: _____
Hon. Evelyn Padin, U.S.D.J.